

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

TEVIN JONES,)	Case No. 2:23-cv-0920
)	
Plaintiff,)	Judge Sarah D. Morrison
v.)	
)	
ENTERPRISE HOLDINGS, INC., et al.,)	
)	
Defendants.)	

DECLARATION OF KAITLIN MCLEOD

I, Kaitlin McLeod, pursuant to 28 U.S.C. § 1746, do swear and affirm under penalty of perjury as follows:

1. I am over the age of 18 and under no legal disability. I am providing this statement voluntarily without any threat of promise or reward having been made to me.
2. I am an associate at Baker & Hostetler and in my role as associate I assist lead counsel on various discovery matters.
3. On April 26, 2024, Defendants emailed Plaintiff a proposed protective order. In response, Defendant provided a standard one tier protective order, unmodified, from the Court's website and asked Defendant to make a list of modifications. Defendant attempted to incorporate Plaintiff's proposed modifications. Plaintiff, however, stated that he could not sign it as modified and made no attempt at proposing his own order, modifying the court's template order, or specifying what further needed to be changed.
4. Defendants asked Plaintiff for dates he was able to meet and confer during the weeks of July 10 and July 17.
5. Plaintiff did not provide Defendants with any dates and/or times to meet and confer.
6. Due to Plaintiff's lack of response, Defendants requested the Court to hold a telephone discovery conference in order to discuss various issues including Plaintiff's willingness to meet and confer on the protective order.
7. On July 9, 2024, Defendants and Plaintiff appeared for a telephone discovery conference with the Court, the Court ordered Plaintiff to meet and confer with Defendants about various issues including a stipulated protective order.

8. On July 22, 2024, the parties met and conferred and Plaintiff stated he did not want a protective order and refused to discuss anything substantively.

Consistent with 28 USC § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 18th day of September 2024, in Cincinnati, Ohio.


Kaitlin McLeod